



July 16, 2019

VIA ECF

The Honorable Michael A. Shipp, U.S.D.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building and U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

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Re: *In re Valeant Pharmaceuticals International, Inc., Securities Litigation*, Master File No. 15-7658 (MAS) (LHG); *In re Valeant Pharmaceuticals International, Inc., Third-Party Payor Litigation*, No. 16-3087 (MAS) (LHG); *Northwestern Mutual Life Insurance Co., et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 18-15286 (MAS) (LHG); *Bahaa Aly, et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 18-17393

Dear Judge Shipp:

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We write on behalf of Valeant Pharmaceuticals International, Inc. and all Defendants in the above-captioned Securities Actions (collectively, "Defendants") in response to Your Honor's July 10th Order regarding the appointment of a special master (No. 15-7658, ECF No. 464). Defendants confirm that they consent to Judge Cavanaugh's appointment under Fed. R. Civ. P. 53(a)(2). For the avoidance of any doubt, to the extent any matter identified in Judge Cavanaugh's letter constitutes a ground for disqualification under 28 U.S.C. § 455(a), Defendants waive the grounds for disqualification under Fed. R. Civ. P. 53(b)(3)(B).

BOSTON

Respectfully submitted,

HARTFORD

s/ Richard Hernandez

STAMFORD

Richard Hernandez

NEW YORK

cc: All Counsel of Record (via ECF)

NEWARK

EAST BRUNSWICK

PHILADELPHIA

WILMINGTON

WASHINGTON, DC